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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS OPPOSITION TO
DEFENDANTS' MOTION IN LIMINE
NO. 27 TO EXCLUDE PROF.
HESSELINK'S SAVED DEVELOPMENT
TIME OPINIONS**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of its Opposition to Defendants’ Motion in Limine to
7 Exclude Prof. Hesselink’s Saved Development Time Opinions (“Waymo’s Opposition”). Waymo’s
8 Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Opposition	Highlighted portions	Waymo
Exhibit 2 to Waymo’s Opposition	Entire document	Waymo and Defendants
Exhibit 3 to Waymo’s Opposition	Highlighted portions	Waymo
Exhibit 4 to Waymo’s Opposition	Entire document	Defendants
Exhibit 5 to Waymo’s Opposition	Entire document	Waymo and Defendants
Exhibit 7 to Waymo’s Opposition	Entire document	Waymo and Defendants
Exhibit 8 to Waymo’s Opposition	Entire document	Waymo and Defendants

15 3. Waymo’s Opposition and exhibits thereto contain information that Defendants have
16 designated as confidential and/or highly confidential.

17 4. Waymo’s Opposition and exhibits thereto also contain or refer to trade secret
18 information, which Waymo seeks to seal. The portions of Waymo’s Opposition and the exhibits
19 thereto identified above contain, reference, and/or describe Waymo’s asserted trade secrets, including
20 as misappropriated by Defendants. Specifically, the documents and/or highlighted portions describe
21 certain technical specifications of Waymo’s trade secrets. I understand that these trade secrets are
22 maintained as secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business
23 (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors access to in-
24 depth descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle system. If
25 such information were made public, I understand that Waymo’s competitive standing would be
26 significantly harmed. Waymo’s request to seal is narrowly tailored to only the confidential
27 information.
28

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on November 20,
3 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7
8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
10 filing of this document has been obtained from Felipe Corredor.

11 /s/ Charles K. Verhoeven

12 Charles K. Verhoeven